

**DOCKETED**

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## **MN8 Energy Comments on the CEC's Network Roaming Workshop**

*Additional submitted attachment is included below.*



California Energy Commission  
1516 Ninth Street  
Sacramento, CA, 95814  
Docket No: 22-EVI-06

## **Re: CEC Workshop on Network Roaming**

MN8 Energy LLC (“MN8”) appreciates the California Energy Commission’s (CEC) continued efforts to drive interoperability across the electric vehicle (EV) charging ecosystem. MN8 develops, owns, and operates renewable energy generation facilities, battery energy storage systems (BESS), and EV charging stations. Today, we provide clean, affordable energy to over 200 world-class enterprise customers and operate a fleet of over 850 energy projects, comprising approximately 3 gigawatts (GW) of solar photovoltaic (PV) and BESS capacity spread across 28 US states. We are also partnering with various customers, such as vehicle OEMs and fleet operators, to develop EV charging solutions with the goal of delivering a reliable and high-quality experience to EV drivers that will enable widespread EV adoption.

The Network Roaming workshop facilitated by the CEC on May 31<sup>st</sup>, 2024, gave stakeholders across the EV charging industry the opportunity to present a diverse set of perspectives as it relates to the different methods of implementing roaming agreements. MN8 shares the CEC’s vision for realizing charging interoperability and a seamless charging experience as a means of accelerating widespread EV adoption. Given the unique characteristics of the different types of roaming agreements, specifically, peer-to-peer agreements and roaming hubs, MN8 believes the CEC should avoid mandating the use of a specific type of roaming agreement configuration. Rather, Charge Point Operators (CPOs) should have the ability to engage in a roaming agreement configuration that best aligns with their customer offerings and business priorities.

### **Different methods of achieving interoperability**

MN8 appreciates the CEC’s recognition of peer-to-peer agreements and hub-based roaming agreements as two viable options to achieve network roaming. The workshop enabled a fruitful discussion where industry participants outlined the benefits of each type of roaming agreement configuration, and why a CPO may decide to choose one over the other. As more CPOs enter into roaming agreements (and as the nature of these agreements continues to evolve), the CEC should take a flexible approach when considering any regulations to facilitate network roaming agreements. Roaming agreements are business-to-business agreements that involve the transfer of sensitive customer data. The CEC should continue to coordinate with industry stakeholders to understand the different approaches to achieving widespread roaming agreements as standards and technologies related to EV charging roaming continue to evolve.

### **Open Charge Point Interface (OCPI) implementation**

MN8 agrees with many of the other EV charging industry stakeholders in that OCPI is the preferred protocol to enable roaming agreements. The CEC should continue to evaluate the evolution of this standard. Like ISO 15118-20, there is currently no available conformance testing method to consistently implement the standard. The CEC should continue to coordinate with relevant stakeholders to ensure regulations and funding program requirements allow for a realistic and effective implementation of OCPI.

**Conclusion**

MN8 appreciates the opportunity to comment on this important matter. A reliable and seamless charging experience is imperative to ensuring that California achieves its EV adoption targets and continued stakeholder engagement on this topic will ensure California continues to lead in driving transportation electrification.

Thank you,

A handwritten signature in black ink that reads "Brian Kee". The signature is written in a cursive style with a large, stylized "B" and "K".

Brian Kee  
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